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19 United States of America

20 UNITED STATES DISTRICT COURT

21 FOR THE CENTRAL DISTRICT OF CALIFORNIA

22 WESTERN DIVISION

23 UNITED STATES OF AMERICA, ) NO. CV 10-1152-ODW (PLAx)

24 Plaintiff, ) **CONSENT JUDGMENT**

25 v. )

26 \$70,020.00 IN U.S. CURRENCY, )

27 Defendant. )

28 WILLIAM WRIGHT, )

Claimant. )

29 On February 16, 2010, plaintiff United States of America  
30 (the "government") filed the Complaint for Forfeiture in this  
31 action, pursuant to 21 U.S.C. § 881(a)(6), on the ground that the  
32 defendant \$70,020.00 in U.S. Currency represented or was  
33 traceable to proceeds of one or more illegal exchanges for a

1 controlled substance or listed chemical in violation of 21 U.S.C.  
2 § 841 *et seq.*; and was furnished or intended to be furnished for;  
3 and was used to facilitate or intended to be used to facilitate,  
4 one or more such exchanges was derived from proceeds traceable to  
5 violations of 18 U.S.C. §§ 1028, 1029 and 1030. Claimant William  
6 Wright (the "claimant") denies the government's allegations and  
7 claim that he is the rightful owner of the defendant.

8 The parties have agreed to settle this forfeiture action and  
9 to avoid further litigation by entering into this consent  
10 judgment.

11 The Court, having been duly advised of and having considered  
12 the matter, and based upon the mutual consent of the parties,  
13 HEREBY ORDERS, ADJUDGES, AND DECREES:

14 1. This Court has jurisdiction over this action pursuant to  
15 28 U.S.C. §§ 1345 and 1355.

16 2. The Complaint for Forfeiture states claims for relief  
17 pursuant to 21 U.S.C. § 881(a)(6).

18 3. Notice of this action has been given as required by  
19 law. No appearance has been made in this action by any person  
20 other than claimant. The Court deems that all potential  
21 claimants other than the claimant admit the allegations of the  
22 Complaint for Forfeiture to be true, and hereby enters default  
23 against all other potential claimants.

24 4. For purposes of settlement of this civil forfeiture  
25 action only, the government shall return the defendant \$70,020 in  
26 U.S. Currency and any interest accrued thereon (collectively, the  
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1 "settlement funds") to the claimants. It is contemplated that  
2 the settlement funds will be returned by a wire transfer into the  
3 Ronald Richards Client Trust Account (the "Trust Account") within  
4 7 weeks of the entry of this judgment. In this regard, the  
5 claimant shall provide all information reasonably necessary to  
6 effectuate the wire transfer, including the account number and  
7 tax identification number for the Trust Account and the social  
8 security numbers of the claimant.

9       5. The claimant hereby release the United States of  
10 America, the State of California, all counties, municipalities  
11 and cities within the State of California, and their agencies,  
12 departments, offices, agents, employees and officers, including,  
13 but not limited to, the United States Attorney's Office, the Drug  
14 Enforcement Administration, the State of California Department of  
15 Justice, the State of California Bureau of Narcotics Enforcement,  
16 and any of their employees and agents, from any and all, known or  
17 unknown, claims, causes of action, rights, and liabilities,  
18 including, without limitation, any claim for attorney's fees,  
19 costs, or interest which may be now or later asserted by or on  
20 behalf of either of the claimant, arising out of or related to  
21 this action or to the seizure or possession of the defendant.  
22 The claimant represents and agrees that he has not assigned and  
23 is the rightful owner of such claims, causes of action and  
24 rights.

25       6. The claimant hereby agrees to defend, indemnify and hold  
26 harmless the United States of America, the State of California,  
27 all counties, municipalities and cities within the State of  
28 California, and their agencies, departments, offices, agents,

1 employees and officers, including, but not limited to, the United  
2 States Attorney's Office, the Drug Enforcement Administration,  
3 the State of California Department of Justice, the State of  
4 California Bureau of Narcotics Enforcement and their employees  
5 and agents, from any and all, known or unknown, claims, causes of  
6 action, rights, and liabilities, including, without limitation,  
7 any claim for attorney's fees, costs, or interest, raised or  
8 asserted by a third party in connection with or related to the  
9 return of the settlement funds.

10       7. This Consent Judgment shall have no res judicata,  
11 collateral estoppel, claim preclusion, issue preclusion or any  
12 precedential effect or value in any action or legal proceeding  
13 involving the claimant.

14       8. The Court finds that there was reasonable cause for the  
15 seizure of the defendant and institution of these proceedings.  
16 This judgment shall be construed as a certificate of reasonable  
17 cause pursuant to 28 U.S.C. § 2465.

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9. The parties shall each bear their own attorney's fees and other costs and expenses of litigation. *Original*

DATED: December 27, 2010

UNITED STATES DISTRICT JUDGE

**CONSENT**

The parties consent to judgment and waive any right of appeal.

DATED: Dec. 21, 2010

ANDRÉ BIROTTE JR.  
United States Attorney

ROBERT E. DUGDALE  
Assistant United States Attorney  
Chief, Criminal Division

STEVEN R. WELK  
Assistant United States Attorney  
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/s/ PIO. S. KIM

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Assistant United States Attorney

Attorneys for Plaintiff  
United States of America

DATED: Dec. 21, 2010

/s/ WILLIAM WRIGHT  
WILLIAM WRIGHT

DATED: Dec. 21, 2010

/s/ RONALD RICHARDS  
RONALD RICHARDS

Attorney for Claimant  
WILLIAM WRIGHT